

PRIVACY POLICY

With this Privacy Policy, LEGAL IS ADVOCATS, SL (hereinafter, we or LEGALIS) informs you of the personal data we collect through the services we offer, and which are going to be reflected in this website, how we treat them and what are the rights that in relation to your personal data and our treatments confers the Personal Data Protection regulation that applies to you.

Applicable regulations

1. Law 29/2021, of October 28, Qualified Data Protection Personnel of the Principality of Andorra (hereinafter, the **LQPD**),
2. Decree 391/2022, of 28-9-2022 approving the Implementing Regulation of the LQPD, and
3. Regulation (EU) 679/2016 of the European Parliament and of the Council, of April 27, 2016, relating to the protection of natural persons with respect to the processing of personal data and the free movement thereof (hereinafter, "the **RGPD**").

In the following table you will find links to facilitate access to different concepts of this policy that may be interesting for you, however, please read all sections of the Legal Notice, of the cookies policy and of this privacy policy before using this website:

- [1. To whom does this Privacy Policy applies?](#)
- [2. Who is responsible for the treatment of your personal data?](#)
- [3. How do we obtain your personal data?](#)
- [4. For what purpose do we use your personal data and what is the legal basis that allows it?](#)
 - [To confirm your identity](#)
 - [To offer you a more personalized service](#)
 - [To initiate and maintain the relationship with our suppliers](#)
 - [To start and maintain the relationship with our customers](#)
 - [To select and hire our staff](#)
 - [To budget and offer you our services](#)
 - [To attend to your requests, queries or complaints](#)
 - [To manage any future claims](#)
 - [To guarantee the operation of our website \(functional cookies\)](#)
 - [To extract aggregate statistics of the use of our website \(analytical cookies\)](#)
 - [To be able to use Google services](#)
 - [To notify you security breaches](#)
 - [For other purposes that are not incompatible with the above](#)
- [5. With whom we can share your personal data?](#)
- [6. How long can we keep your personal data?](#)
- [7. What rights do you have?](#)
 - [Your rights](#)
 - [Where and how you can exercise your rights](#)
 - [Forms for exercising your rights](#)
- [8. How do we protect your personal data?](#)
- [9. Modifications to this Privacy Policy](#)

1. To whom does this Privacy Policy applies?

This Policy applies to people who relate to LEGALIS through this website, to users of the services that LEGALIS offers for the purposes described in section 4 of this policy (the **Services**), and to all people whose personal information (for example, their images) may appear on our Website or in the context of the Services.

2. Who is responsible for the treatment of your personal data?

According to this Policy, the only one responsible for your personal data treatment is:

LEGAL IS ADVOCATS, SL (LEGALIS), with NRT L-708876-Y and registered office at Calle C/ Prat de la Creu, no. 93, 1st. flat, AD500 Andorra la Vella (Principality of Andorra).

In this context, we have an external Data Protection Officer—[Win2win, SLU](#), being an Andorran company specialized in privacy and personal data protection—to whom you can contact via DPDextern@win2win.ad if you are interested in.

LEGALIS is not responsible for the activities carried out by other websites, even if you access to them by using the links which are on our website. That is why we strongly recommend that you carefully read the information provided by these other controllers before giving them your personal data (especially, the privacy and cookies policies of each website you visit), and contact the manager referring above in case you have any concerns or questions.

3. How do we obtain your personal data?

Generally, you are the ones that directly provides us your personal data - for example, through the forms on our website -. The only exceptions to this rule are:

- Data provided to us by third parties who reserve or purchase our products or services on their behalf (as beneficiary);
- Contact details provided to us by our service and product providers when you represent them;
- Images or other personal data corresponding to any news in which we consider that the public interest, our obligation of transparency and the right of information prevail over the possible interests of the people whose image or other personal data are published in our website or on our social networks;

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- Personal data that may appear in emails and instant messaging that we receive, or through forms on our website; and
- The cookies of this website, about which you will find more information in our cookie policy.

4. [For what purpose do we use your personal data and what is the legal basis that allows it?](#)

To confirm your identity

In case we do not know you, we may use your personal data to confirm your identity and, if it's necessary, the entity you work for and what is your job in the entity. We follow this procedure when we are subject to legal obligations that require us to authenticate your identity before further processing your data, or based on our legitimate interest we want to make sure that your request is genuine and not made for fraudulent reasons or spam.

To offer you a more personalized service

We collect the optional data that you voluntarily provide us in the forms in order to offer you a more personalized service in relation to the specific purpose of which the form is specifically dedicated, and to obtain statistics which will help us improving our care and services.

The basis that legitimize us to treat personal data for this purpose is the consent you give when you provide the information to us. Although, you can retract and withdraw your consent from us at any time, with the sole effect that we will no longer use this data and, therefore, the services associated with the form will be less personalized from now on.

To initiated and maintain the relationship with our suppliers

If you represent a supplier of products or services, we collect your contact details and your signature to:

- a) Manage our relationships with the supplier it represents.
- b) Manage the corresponding file to include them to our list of authorized suppliers.
- c) Manage the budgets and invoices of the supplier it represents.

The treatments linked to the purposes a) and b) are legitimized by the employment or service contract signed with the supplier you represent and our legitimate interest in contacting them. And the treatments linked to the purpose c) are legitimated for being necessary for the execution of the contract or contracts you have signed with us.

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To initiated and maintain the relationship with our customers

We collect your personal data received orally or in writing directly from you or from a third party who represents you or of whom you are a beneficiary, when you hire us for a service with the purpose of managing a contract, providing you the corresponding service and invoicing it.

Additionally, on the basis of the contractual relationship, we may communicate to you orally or in writing commercial information related to our products or services.

The treatment of this data is legitimate because it is necessary for the execution of the services or products contract in which you are an interested party, and due to our legitimate interest in keeping you informed in relation to the products or services purchased.

To select and hire our staff

We process the CV data that you voluntarily send us, in addition to the strictly professional data that appears in your social media profile, as in case on LinkedIn, as well as those personal data collected during interviews and tests that you voluntarily carry out , to manage the relationship regarding your application for a job at LEGALIS, including the process of searching, filtering and storing your CV as a potential candidate, the staff selection process and the recruitment process.

The basis of legitimacy for the aforementioned treatments is your consent, giving it when you send us your CV, fill out a test or attend an interview, which is necessary for the execution of pre-contractual measures taken if you request them, and in case we do not have an open selection process or if you are not hired but we consider that you may fit into a future selection process, our legitimate interest is to preserve your CV in order to take it into account in such future selection process. The basis that legitimizes us to consult your social media profile in strictly professional terms, such as LinkedIn, is our legitimate interest in enriching the professional information of the candidates reducing the time that both you and LEGALIS will take in the selection process. You may withdraw your consent or object to our legitimate interest as set out in section 7 of this policy, and if you do so there will be no effect other than the destruction of your CV (if you withdraw your consent) or limitate its conservation to the selection process for which you have sent us your CV.

To Budget and offer you our services

We collect the data you provide us in our offices, by telephone or by email to prepare a service or product proposal that best suits what you ask us for, and if you accept it, to prepare the corresponding contract.

Sometimes, we collect more information about our customers or potential customers and/or them beneficial owners of these for the following purposes:

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- We do a "due diligence" with the aim of advising you with guarantees regarding the investment in fixed or variable capital of the deposit you made (or will make) on behalf of LEGALIS, and adapt it to your investment and risk profile and to the fund's risk, diversifying the investment; and
- We fill out KYC (Know Your Customer) forms whose main objective is to prevent natural or legal persons from using legitimate services to participate in illegal activities.

Finally, we inform you that we do not make any automated decisions based on your investment and risk profile.

The basis that legitimizes the treatments for the management of the budget is the consent expressed by giving us the data we need to prepare it, while the one that legitimizes the treatments associated with the service, if you hire us, is the need for the execution of the contract that regulates the terms and conditions of use of this specific service.

Finally, the basis that legitimizes the treatment associated with KYC management is our legal obligation in accordance with Law 14/2017, of June 22, on the prevention and fight against money or securities laundering and the financing of terrorism.

To attend your requests, inquiries, or claims

We collect the personal data you provide us in your e-mails or in your instant messaging messages, by telephone, through the contact form, or through requests to exercise rights, to attend to your requests, inquiries or claims in relation to our services or your rights over your personal data.

The legal basis for this treatment is the consent you express by sending or giving us this data, our legal obligation to attend to your rights requests, and our legitimate interest in attending to you. The supply of your personal data is, therefore, voluntary, although if you do not provide them, we will not be able to process your request, query, or claim. You may revoke your consent whenever you wish, in that case, it will be impossible to continue processing your request, query, or claim.

To handle any future claims

We keep the data that may be necessary to manage your possible claims, or ours claims, based on our legitimate interest to defend ourselves and safeguard our rights.

To ensure the efficiency of our website (functional cookies)

We use functional cookies to collect, store, consult and process personal information (linked to you through unique identifiers or IP addresses)

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from the browser of your device, with the aim of guarantee the correct functioning of our website.

As they are cookies needed for the proper functioning of the website or personalized cookies, their use does not require your express consent, being the basis that legitimizes us to use them our legitimate interest to be able to provide you services and products by our website services in accordance with your preferences.

You can find more information about these cookies in our cookie policy.

To extract added statistics from the use of our website
(analytical cookies)

We use analytical or statistical cookies to identify the most and least visited pages, analyze which contents are considered more interesting to our visitors, and measure the success of our information campaigns, all with the aim of improving the services we offer through the Web. All these purposes provide aggregated results, in which it is not possible to identify the interests of any person.

As they are analytical cookies, we will not use them until we have your consent, and in case that consent is not given or withdrawn, it will have no more effect than hindering our purpose of improving the website through analysis additional statistics resulting from the navigation of our visitors.

You can find more information about these cookies in our cookie policy.

To use Google services

Additionally, as an obligation that Google LLC, a company of which Google Ireland Ltd is a subsidiary, imposes on entities that, like us, use Google Analytics tools, we inform you that these two services operated by Google Inc., domiciled in 1600 Amphitheater Parkway, Mountain View, CA 94043, USA, and that Google Inc. is a beneficiary of these.

The information generated by cookies about the use of this website and your advertising preferences is usually send it to a Google server in the USA where such information is stored. If you wish to obtain more information, you may consult [the page that describes how Google uses the information from our website](#) and/or [Google's privacy policy regarding the mentioned services](#).

We inform you that we have activated the IP anonymization function in the Google service to add additional safeguards to the standard contractual clauses that protect this international data transfer to the USA. Thereby, Google will reduce your IP address before transmitting it to the USA (process to obfuscate of your identity). So, only in exceptional cases the completely IP address will be sent to a Google server in the

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USA, where the IP reduction will be occurred. Google guarantees that the IP address transmitted by your browser to Google Analytics will not related to other data held by Google.

You can consult the categories of personal data processed by these services at privacy.google.com/businesses/ads-services.

To notify you security gaps

At LEGALIS we take security measures taking into account the level of risk to protect personal information from possible loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal information; however, in case we determine that your data has been misappropriated (even by an employee or former employee of LEGALIS), has been exposed through a security breach, or has been improperly acquired by a third party, exposing -to a higher risk, we will inform you immediately about this security breach, misappropriation or acquisition, but also the measures we have taken and those we recommend you to take so the breach does not affect you.

The basis that legitimizes this treatment is the legal obligation set out in article 37 of the LQPD (35 of the RGPD), and our legitimate interest in preventing this security gap from harming you.

For other purposes that are not incompatible with the previous ones

We may use your personal data for other purposes that are not incompatible with those previously indicated (such as archival purposes for reasons of public interest, scientific or historical research purposes, or statistical purposes) as long as it is permitted by the applicable law in terms of personal data protection, and of course, acting the whole time in accordance with this and the rest of the applicable regulations.

5. Whithom can we share your personal data?

We are not going to share your personal data, unless:

- You request it from us.
- We have a legal obligation to do so.
- If it is necessary to enforce the terms and conditions of our services.
- If it is necessary to detect, prevent or otherwise address fraud, security, or technical problems.
- You contract our products or services through intermediaries (for example, your representative or your company) to whom we have to deliver services that they have acquired on your behalf or for you, either with the consent you have given to them, in order to legally represents you, or because you have explicitly authorized us to do so.
- We are co-responsible for collecting data, so that, always with your consent, other entities process them on their own behalf. This is the case of:

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- Google Ireland Ltd, with registered office at 4 Gordon House Street, Barrow - Dublin, Ireland, to whom we have entrusted the processing of data from cookies necessary to use its Analytics services. Google Ireland Ltd acts as an independent controller for all processing carried out on its behalf in accordance with its privacy policy. We transfer data to Google Ireland Ltd on the basis of the data protection agreement that this company located in the EU includes in the addendum to the standard contract for countries suitable for the RGPD, as is the case of Andorra, in which we add the additional safeguard of activating the anonymization of the IPs that collect cookies. In our cookie policy you will see what kind of analytical and advertising cookies we offer and how to configure them.
- A company subcontracted by us needs to process personal data on our behalf (for example, the company that provides us the Data Protection Officer services, and that must attend to your rights requests); always under the terms and conditions of the corresponding data processor contract.
- A company subcontracted by us may have access to the personal data we have on our website or in our systems from time to time, even if they do not need to process it on our behalf. This is the case, for example, of the web development and maintenance company or some of the services of our IT service providers. Given that they could access LEGALIS data, they must have signed a service provision contract that obliges them to maintain the same level of privacy as we have it in LEGALIS.
- We need to protect or defend the rights or property of LEGALIS.

It is not planned to make any international transfer of personal data, and, if we eventually need to make them, they will comply with what is established by the regulations in force that apply to us at any given time.

6. How long do we keep your personal data?

LEGALIS keeps your personal data exclusively during the time that the treatments that require them last and then, for all the time that it takes to prescribe the legal responsibilities that apply to us at any time, derived from the treatment in question (including the obligation to be able to demonstrate that we have responded to your request of deleting your personal data).

For example, we will destroy your CV after 5 years, as we consider it is outdated in accordance to the purpose for which it is dedicated.

We will destroy any unnecessary or disproportionate personal data that may appear in emails and instant messages we receive, or via forms on our website as soon as we receive it.

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We will destroy (and rectify) any personal data that we consider to be inaccurate once we have verify its inaccuracy.

In case you send us a copy of your identity document, we will destroy it as soon as we have checked that it fulfills the function for which you sent it to us.

When we do not have a legitimate purpose for processing some of your personal data, we will delete it, and if this is not possible (for example, because it is in backup copies), we will store it safely and lock them into isolate- those from any further processing until their elimination is possible.

7. What rights do you have?

You have the right to confirm whether or not we hold any of your personal data.

We remind you that, when we share personal data with other controllers, you will have to exercise your rights directly against those controllers by following the instructions provided in their own privacy policies. Specifically, in relation to the data that our cookies share with Google, we inform you that you can install in your browser Chrome, Internet Explorer, Safari, Firefox and/or Opera, [the plug-in to not send Google Analytics data or Google Ads to Google Inc.](#)

We explain what other rights you have and how to exercise them.

Your rights

You can ask us to execute the following rights:

- [Access to your personal data.](#)
- [Rectification of some of your personal data](#), specifying the reason.
- [Suppression of any or all of your personal data.](#)
- [Limitation of the processing of your data](#), specifying the reason for the limitation.
- [Opposition to the processing of your personal data.](#)
- [Portability of your data](#) when the legitimate basis for collection has been consent or a contract.
- [Right to not be subject to automated individual decisions.](#)

The consent given, both for the treatment and for the data transfer of interested parties, is revocable at any time by communicating it to us, just like any other right, as indicated in the following section. Such revocation in no case will be retroactive.

Where and how you can exercise your rights

You can exercise your rights:

- 1 By sending a written request to LEGALIS, addressed to our postal address, indicated in section 2 of this policy, indicating us

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a means of contact with you to be able to respond to your request or asking for more information if necessary. We would appreciate if you please mark the envelope "Exercise of Personal Data Protection Rights".

2 By sending an email or the form associated with the right you wish to exercise to the email address DPDextern@win2win.ad, indicating in the subject box "Exercise of Personal Data Protection Rights". You will find these forms later, in this same section of the privacy policy.

In both cases, if it is not possible for us to verify that you are who you say you are, we will ask you to please send us proof of your identity, to ensure that we are answering to interested party or his legal representative.

If the sender of the mail does so as the representative of the interested person, the representative's accreditation must be done through documents or legal instruments that correctly identify the interested person and the representative and specify the order or procedure for which the representation is delegated.

Finally, if you consider that you have not obtained a fully satisfaction with regard to the attention to the exercise of your rights, we inform you that you may submit a claim to the national control authority of your country or contact to the Andorran Data Protection Agency ([APDA](#)).

Forms for exercising your rights

In order to facilitate the exercise of your rights, we strongly recommend using the corresponding application forms from the following:

- [Form for exercising the right of access](#)
- [Form for exercising the right of rectification](#)
- Form for exercising the right of opposition ([model A](#) and [model B](#))
- [Form for exercising the right of deletion](#)
- [Form for exercising the right to limit treatment](#)
- [Form for exercising the right to portability](#)
- [Form for exercising the right not to be subject to automated individual decisions](#)

8. How do we protect your personal data?

We are completely committed to protect your privacy and your personal data. We have drawn up a record of all the personal data processing activities that we carry out, we have analyzed the risk that each of these activities may pose to you, and we have implemented the appropriate legal, technical and organizational safeguards to avoid, as far as possible, the alteration of your personal data, its misuse, loss, theft, unauthorized access, or unauthorized treatment. We conveniently keep our policies up to date to ensure

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that we provide you all the information we have about the processing of your personal data, and to ensure that our staff receive appropriate guidelines regarding how they should handle your personal data. We have signed data protection clauses and data processor contracts with all our service providers, adhering the need that each of them has to process personal data.

We restrict access to personal data to those employees who really need to know them to carry out any of the treatments referred to in this policy, and we have trained and made them aware of the importance of confidentiality and the maintenance of the integrity and availability of information, as well as on the disciplinary measures that any eventual infringement in this matter would involve.

However, if LEGALIS determines that your data has been misappropriated (even by an employee of LEGALIS), exposed through a security breach, or improperly acquired by a third party, LEGALIS will notify you immediately. of this security breach, misappropriation or acquisition.

9. Modifications of this privacy policy

We will update this policy when necessary to reflect any changes that may occur to the regulations or our treatments. If the changes are substantial, we will notify you before they become effective by sending you a notification or by posting a prominent notice on this website, and you will have the option to exercise your rights as we informed you in the previous section. In any case, we recommend that you periodically review this privacy policy to know how we protect your personal data.

If you have any questions about this policy, do not hesitate to contact us via the following e-mail address DPDextern@win2win.ad.

Last update: 5th of April 2023